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Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

APPROXIMATELY \$23,505.00 IN
U.S. CURRENCY,

Defendant.

2:24-MC-00025-DJC-CKD

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

It is hereby stipulated by and between the United States of America and potential claimant Gal Yifrach ("claimant"), by and through their respective counsel, as follows:

1. On or about October 26, 2023, claimant filed a claim in the administrative forfeiture proceeding with the Federal Bureau of Investigation with respect to the Approximately \$23,505.00 in U.S. Currency (hereafter "defendant currency"), which was seized on or about July 27, 2023.

2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture within ninety days after a claim has been filed in the administrative

1 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
2 parties. That deadline was January 24, 2024.

3 4. By *Amended* Stipulation and Order filed January 26, 2024, the parties stipulated to extend
4 to April 23, 2024, the time in which the United States is required to file a civil complaint for forfeiture
5 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
6 subject to forfeiture.

7 5. By Stipulation and Order filed April 23, 2024, the parties stipulated to extend to June 21,
8 2024, the time in which the United States is required to file a civil complaint for forfeiture against the
9 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
10 forfeiture.

11 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
12 to July 22, 2024, the time in which the United States is required to file a civil complaint for forfeiture
13 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
14 subject to forfeiture.

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7. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture shall be extended to July 22, 2024.

Dated: 6/17/2024

PHILLIP A. TALBERT
United States Attorney

By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

Dated: 6/13/2024

/s/ Richard M. Barnett
RICHARD M. BARNETT
Attorney for potential claimant
Gal Yifrach

(Signature authorized by email)

IT IS SO ORDERED.

Dated: June 17, 2024

/s/ Daniel J. Calabretta
THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE